

### **REMARKS/ARGUMENTS**

Prior to the entry of this Amendment, claims 1, 3-5, 7-18, 20-24, 26-31, and 33-42 were pending in this application. No claims have been amended, no claims have been added, and no claims have been canceled herein. Therefore claims 1, 3-5, 7-18, 20-24, 26-31, and 33-42 remain pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

#### **35 U.S.C. § 103 Rejection, Schneider in view of Miller**

The Final Office Action has further rejected claims 1, 3-5, 7-18, 20-24, 26-31 and 33-42 under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,408,336 of Schneider et al. (hereinafter "Schneider") in view of U. S. Patent No. 6,839,752 of Miller et al. (hereinafter "Miller"). The Applicants respectfully traverse the rejection and submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, the references do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a set of policies for changing static membership of a group.

As discussed previously, Schneider is directed to "control of access to data in a distributed environment" (col. 1, lines 32-33) and more specifically to making access filters more

scalable by decentralizing administration of these filters (col. 5, line 66 - col. 6, line 1). Under Schneider, "a member of an administrative user set which administers an object may make administrative policy for the object; this permits an administrative user set to delegate its right to administer the object to another administrative user group." (Col. 6, lines 14-17) "When the access filter is set up, a built-in administrative policy gives a built-in administrative user group called the security officer the right to make administrative policy for all objects in the system." (Col. 6, lines 22-25) "Generally, the policy maker policy is set up to give only a small number of high-level security experts the right to make access policy." (Col. 6, lines 28-30) "The remaining administrative policy is delegated to user groups who have the requisite knowledge of the entities being administered." (Col. 6, lines 30-33)

That is, Schneider teaches delegating some administrative tasks to sub-administrators for the various groups. These sub-administrators, such as a department secretary (col. 6, lines 44-47), then perform these delegated tasks, such as adding or removing members to or from the group (col. 6, lines 57-59). Schneider discloses two types of policies, an access policy for determining how users may access information and an administrative policy for determining how administrators may administer and delegate access policies. (Co. 6, lines 3-13) However, Schneider does not teach or suggest a policy for changing static membership in a group. Rather, Schneider teaches delegating some administrative tasks to sub-administrators for the various groups, such as a department secretary, who can then perform these delegated tasks, such as adding members to the group.

In an effort to show a teaching of a policy for changing static membership in a group, the Office Action points to col. 24, lines 32-54. This portion of Schneider recites in total:

"FIG. 11 shows the display 1101 used to define policies. Which type of policy is being defined is specified in button bar 1113; as indicated there, display 1101 is defining access policy. All of the policy displays have the same general format: a window 1103 which contains a hierarchical display of user groups, a window 1105 which contains a display of a hierarchy of objects for which policy may be

defined and a policy definition window 1107 which contains access policy definitions 1108. In the hierarchy of objects, objects for which the user of display 1101 has the right to define policies appear in black; the others appear in gray. In display 1101, what is being defined is access policies, so the objects are information sets.

Each access policy definition has four parts:

an active check box 1117 that indicates whether the access policy defined by the definition is active, i.e., being used to control access;

the user group 1119 for which the access policy is being defined;

the information set 1123 for which the access policy is being defined; and

access field 1121, which indicates whether access is being allowed or denied and thereby defines the access policy."

However, this portion of Schneider is completely silent with regard to a policy for changing static membership in a group. Rather, this portion discusses and FIG. 11 illustrates an access policy. This access policy defines whether a particular group is to be allowed or denied access for a particular resource group. (FIG. 11 and Col. 24, lines 45-54) However, this does not define a policy for adding or removing, i.e., changing, static membership in those groups, only the access that is permitted for those groups to various resources. Thus, Schneider does not teach or suggest a policy for changing static membership in a group.

Miller is "directed to clustered computer systems, and in particular, to the sharing of group data during membership changes in such systems." (Col. 1, lines 8-10) Miller "utilize[s] subgroup-specific leader members to exchange group data between group members during the handling of a request to organize members into a group in a clustered computer system." (Col. 3, lines 12-15) Under Miller "the subgroups with which group members are associated for the purposes of determining subgroup leaders are typically defined based upon known coherency between local group data stored in various members of a group." (Col. 3, lines 29-32) That is, under Miller, group membership is determined based on each member having

stored thereon a set of data that is coherent with that of other members of the group. However, Miller does not teach or suggest accessing an indication of a first policy from a set of policies for changing static membership of a group.

The combination of Schneider and Miller is no more relevant to the pending claims than either reference alone since neither reference, alone or in combination, teaches or suggests accessing an indication of a first policy from a set of policies for changing static membership of a group. Rather, Schneider teaches delegating some administrative tasks to sub-administrators for the various groups, such as a department secretary, who can then perform these delegated tasks, such as adding members to the group while Miller teaches determining group membership based on each member having stored thereon a set of data that is coherent with that of other members of the group.

Claim 1, upon which claims 3-5 and 7-17 depend, claim 24, upon which claims 26-30 depend, and claim 37, upon which claims 38-39 depend, each recite in part "receiving from a first entity a request to add the first entity to a first group; accessing an indication of a first policy from a set of policies for changing static membership of said first group; and adding said first entity to said first group as a static member based on said first policy." Neither Schneider nor Miller teaches or suggests, alone or in combination, accessing an indication of a first policy from a set of policies for changing static membership of said first group. Rather Schneider teaches delegating some administrative tasks to sub-administrators for the various groups, such as a department secretary, who can then perform these delegated tasks, such as adding members to the group while Miller teaches determining group membership based on each member having stored thereon a set of data that is coherent with that of other members of the group. For at least these reasons, claims 1, 3-5, 7-17, 24, 26-30, and 37-39 should be allowed.

Claim 18, upon which claims 20-23 depend, claim 31, upon which claims 33-36 depend, and claim 40, upon which claims 41-42 depend, each recite in part "receiving from a first static member a request to remove the first static member from a first group; accessing an

indication of a first policy from a set of policies for changing static membership of said first group; and removing said first static member from said first group based on said first policy." Neither Schneider nor Miller teaches or suggests, alone or in combination, accessing an indication of a first policy from a set of policies for changing static membership of said first group. Rather Schneider teaches delegating some administrative tasks to sub-administrators for the various groups, such as a department secretary, who can then perform these delegated tasks, such as adding members to the group while Miller teaches determining group membership based on each member having stored thereon a set of data that is coherent with that of other members of the group. For at least these reasons, claims 18, 20-23, 31, 33-36, and 40-42 should be allowed.

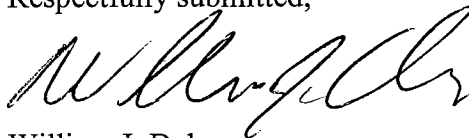
### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

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Respectfully submitted,



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